

a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

Count Two

On or about January 22, 2018 in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**DANIEL SEPULVEDA
JOSE LUIS GARCIA
[REDACTED]
EDGAR YVAN MORENO BARRAGAN
[REDACTED]
and
LUIS SEPULVEDA**

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is, approximately 123 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

Count Three

On or about January 17, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**EVARISTO SEPULVEDA, III
JUAN INDALECIO GARCIA
JOSE LUIS GARCIA
and
RENE SEPULVEDA**

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is, approximately 320 kilograms of a

mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

Count Four

On or about August 30, 2019, in the Southern District of Texas, and within the jurisdiction of the Court, defendant,

JOSE LUIS GARCIA

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the receipt of \$275, 205.00 in United States currency which involved the proceeds of a specified unlawful activity, that is, the distribution of a controlled substance, an offense punishable under Title 21 of the laws of the United States, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is, funds represented the proceeds of some form of unlawful activity.

In violation of Title 18 United States Code Sections 1956(a)(1)(B)(i) and 2.

Count Five

On or about August 30, 2019, in the Southern District of Texas, and within the jurisdiction of the Court, defendant,

DANIEL SEPULVEDA

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the receipt of \$83,920.00 in United States currency which involved the proceeds of a specified unlawful activity, that is, the distribution of a controlled substance, an

offense punishable under Title 21 of the laws of the United States, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is, funds represented the proceeds of some form of unlawful activity.

In violation of Title 18 United States Code Sections 1956(a)(1)(B)(i) and 2.

Count Six

On or about August 30, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

JOSE LUIS GARCIA

did corruptly attempt to, alter destroy, mutilate, and conceal a record, document, or other object or attempt to do so, with intent to impair its integrity and availability for use in an official proceeding.

In violation of Title 18, United States Code, Section 1512(c) (1), and Title 18, United States Code, Section 2.

Count Seven

On or about February 5, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

JOSE LUIS GARCIA

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the receipt of \$18,620.00 in United States currency which involved the proceeds of a specified unlawful activity, that is, the distribution of a controlled substance, an offense punishable under Title 21 of the laws of the United States, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and

attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is, funds represented the proceeds of some form of unlawful activity.

In violation of Title 18 United States Code Sections 1956(a)(1)(B)(i) and 2.

Count Eight

On or about February 5, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

JOSE LUIS GARCIA

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the receipt of \$52,442.00 in United States currency which involved the proceeds of a specified unlawful activity, that is, the distribution of a controlled substance, an offense punishable under Title 21 of the laws of the United States, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is, funds represented the proceeds of some form of unlawful activity.

In violation of Title 18 United States Code Sections 1956(a)(1)(B)(i) and 2.

Count Nine

On or about February 5, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

DANIEL SEPULVEDA

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the receipt of \$4,100.00 in United States currency which involved the proceeds of a specified unlawful activity, that is, the distribution of a controlled substance, an offense punishable under Title 21 of the laws of the United States, knowing that the transaction

was designed in whole and in part to conceal and disguise, the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is, funds represented the proceeds of some form of unlawful activity.

In violation of Title 18 United States Code Sections 1956(a)(1)(B)(i) and 2.

Count Ten

From on or about April 2002 and continuing and up to and including February 5, 2020 in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

**DANIEL SEPULVEDA
and
JOSE LUIS GARCIA**

did knowingly and intentionally conspire and agree with other persons known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

- a. did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the receipt of United States currency which involved the proceeds of a specified unlawful activity, that is, the distribution of a controlled substance, an offense punishable under Title 21 of the laws of the United States, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is, funds represented the proceeds of some form of unlawful activity.
- b. knowingly conduct and attempt to conduct a financial transaction affecting

interstate and foreign commerce, to wit, the purchase of the properties, both real and personal, which involved the proceeds of a specified unlawful activity, that is, the distribution of a controlled substance, a violation of Title 21, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is, funds represented the proceeds of some form of unlawful activity., in violation of Title 18 United States Code Sections 1956(a)(1)(B)(i).

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i), 1956(a)(2)(A), and (h).

Count Eleven

On or about April 10, 2017 in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

JOSE LUIS GARCIA

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the purchase of the property located at 2512 S. C St. McAllen, Texas, which involved the proceeds of a specified unlawful activity, that is, the distribution of a controlled substance, an offense punishable under Title 21 of the laws of the United States, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is, funds represented the proceeds of some form of unlawful activity.

In violation of Title 18 United States Code Sections 1956(a)(1)(B)(i) and 2.

Counts Twelve through Fifteen

On or about April 21, 2017 in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

JULISA PENA

did knowingly engage and attempt to engage in the following monetary transactions by through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000.00, that is the transfer of U.S. currency, such property having been derived from a specified unlawful activity, that is, illegal drug trafficking.

<u>COUNT</u>	<u>DEFENDANT</u>	<u>DATE</u>	<u>MONETARY TRANSACTION</u>
12	Julisa Pena	April 21, 2017	\$25,000.00 U.S Currency
13	Julisa Pena	May 8, 2017	\$35,000.00 U.S Currency
14	Julisa Pena	May 23, 2017	\$25,000.00 U.S Currency
15	Julisa Pena	June 30, 2018	\$25,000.00 U.S Currency

All in violation of Title 18, United States Codes, Sections 1957 and 2.

NOTICE OF CRIMINAL FORFEITURE

**NOTICE OF FORFEITURE
(21 U.S.C. § 853)**

Pursuant to Title 21, United States Code, Section 853, the United States gives notice to the Defendants charged in Counts One through Five of this Indictment, that upon conviction of a violation of Title 21, United States Code, Sections 841 and/or 846,

1. all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and
2. all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation,

is subject to forfeiture.

NOTICE OF FORFEITURE
(18 U.S.C. § 982(a)(1))

Pursuant to Title 18, United States Code, Section 982(a)(1), the United States gives notice to the Defendants charged in Count Six of this Indictment that upon conviction of a violation of Title 18, United States Code, Section 1956, including conspiracy, all property, real and personal, involved in such violation, and all property traceable to such property, is subject to forfeiture.

MONEY JUDGMENT

Defendants are notified that upon conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture, for which the Defendants may be jointly and severally liable, and which is at least 10 million dollars.

PROPERTY SUBJECT TO FORFEITURE

Defendants are notified that the property subject to forfeiture includes, but is not limited to, the following personal property:

Asset No.	Asset	Description (including VIN or account number)
1	\$83,920.00 in United States currency	Seized from D.S. on or about August 30, 2019
2	\$275,205.00 in United States currency	Seized from J. G.on or about August 30,2019
3	\$4,100.00 in United States currency	Seized from D.S on or about February 5,2020
4	\$52,442.00 in United States currency	Seized from J.G. on or about February 5, 2020
5	\$18, 620.00 in United States currency	Seized from J.G. on or about February 5, 2020

Defendants are further notified that the property subject to forfeiture includes, but is not limited to, the following real property:

- a. The real property, improvements and appurtenances located at 25 Midway, Rio Grande City, Texas and legally described as follows:

Lot Six (6) Midway Acres S/D, Property Description: Starr County Property ID: 94625, Geographic ID: 11963-00000-00600-000000

- b. The real property, improvements and appurtenances located at 27 Midway, Rio Grande City, Texas and legally described as follows:

Lot Seven (7) Midway Acres S/D, Property Description: Starr County Property ID: 94626, Geographic ID: 11963-00000-00700-000000

- c. The real property, improvements and appurtenances located at 3147 Mesquite Country Ln., Rio Grande City, Texas and legally described as follows:

Lot Eight (8) Mesquite Country S/D, Property Description: Starr County Property ID: 82386, Geographic ID: 11918-00000-00800-000000

- d. The real property, improvements and appurtenances located at 2512 S. C St., McAllen, Texas and legally described as follows:

Lot Three A (3A) San Angel Country, Property Description: Hidalgo County Property ID: 1013326, Geographic ID: S0270-00-000-003A-00

- e. The real property, improvements and appurtenances located at 39 Alegria, Rio Grande City, Texas and legally described as follows:

Lot Thirty-Two (32) La Amistad S/DDEED12, Property Description: Starr County Property ID: 72805, Geographic ID: 10495-00000-03200-000000

- f. The real property, improvements and appurtenances located at 1049 Navajo, Rio Grande City, Texas and legally described as follows:

Lot Seven and Eight (7 AND 8) North Gate S/D Phase 1, Property Description: Starr County Property ID: 96747, Geographic ID: 12970-00000-00700-000000

- g. The real property, improvements and appurtenances located at 3396 W. US Hwy 83, Rio Grande City, Texas and legally described as follows:

Lot Six (6) Midway S/DDEED 03, Property Description: Starr County Property ID: 75446, Geographic ID: 11960-00000-00600-000000

- h. The real property, improvements and appurtenances located and legally described as follows:

Cameron County Property ID: 412884 (ABST 10- PICHER N 1/2 W 1/3 & N1/2 E2/3 BLK 5 7.776 OUT OF 9.0000 AC) with Geographic ID: 85-7490-0050-0101-00

Cameron County Property ID: 181959 (ABST 10- PICHER BLK 5 S 1/2 E 1/3 3.3400 AC) with Geographic ID: 85-7490-0050-0500-00

Cameron County Property ID: 181956 (ABST 10- PICHER BLK 4 E 1/3, 6.6600 ACRES) with Geographic ID: 85-7490-0040-0200-00

Cameron County Property ID: 181960 (ABST 10- PICHER E 2/3 & W1/3 BLK6, 20.0000 AC) with Geographic ID: 85-7490-0060-0100-00

- i. The real property, improvements and appurtenances located and legally described as follows:

GPS: 26.364938,-98.891692, Acreage, 140 Porras Bros. Rio Grande City, TX
Property Description: Starr County Property ID: 998772, Midway Road Ranches
Tract-4 AB 126 POR 74 P LUGO SH 6-A, 7 7 SH-A, Geographic ID: 11961-00000-00400-000000

- j. The real property, improvements and appurtenances located and legally described as follows:

GPS: 26.373550,-98.840032, Acreage, Banco Isaguirre (Shufford's Property)
Property Description: Starr County Property ID: 96038, BANCO ISAGUIRRE #58 &
AB 82 POR 78 D GARCIA, Geographic ID: 89000-01500-00000-000005

A TRUE BILL

FOREPERSON

UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY